

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Carrier Current Systems, including	)	ET Docket No. 03-104
Broadband over Power Line Systems	)	
	)	
Amendment of Part 15 regarding new	)	
requirements and measurement	)	ET Docket No. 04-37
guidelines for Access Broadband over	)	
Power Lines Systems	)	

**OPPOSITION OF SPIDCOM TECHNOLOGIES S.A. TO THE  
PETITION FOR RECONSIDERATION OF AERONAUTICAL RADIO, INC**

SPiDCOM Technologies S.A. ("SPiDCOM") hereby submits its Opposition to the Petition for Reconsideration filed by Aeronautical Radio, Inc. ("ARINC") filed 7-Feb.2005 and corrected 8-Mar-2005 seeking changes to the Commission's decisions in its Report and Order in the above-captioned proceedings.

**INTRODUCTION**

SPiDCOM is a company engaged in the design and development of semiconductor circuits and modules that utilizes medium and low voltage lines as a communication medium for "last-mile" broadband access communication and indoor local area networks. SPiDCOM actively markets this technology worldwide including to companies operating within the United States of America.

**DISCUSSION**

ARINC requests the Commission to change its decision to leave in place its rule prescribing a 40dB/decade extrapolation factor for use in radiated power measurements. ARINC also asks the Commission extend the ban on use of specific Aeronautical Mobile and

Aeronautical Navigational frequencies to low-voltage BPL and indoor LAN systems, a position specifically rejected by the Commission in the Report and Order.

We support the analysis that there is no evidence justifying the changes to the extrapolation factor or to impose new noticing requirements submitted on 23-Mar-2005 by the Intellon Corporation in their Opposition to the ARINC's Petition for Reconsideration.

In addition, if accepted, ARINC's proposals would significantly impact the performance, capabilities and future technology evolution of Access BPL and indoor LAN equipment available within the U.S.A. and could bring into question the commercial viability of such equipment in this region.

SPiDCOM has included in its products software and hardware designs compatible with the new rules for Access BPL systems. These designs, specifically for interference mitigation, demonstrate a large technological step ensuring interference protection and facilitating effective and efficient access to spectrum.

## **CONCLUSION**

SPiDCOM respectfully requests the Commission to deny ARINC's Petition for Reconsideration, as discussed above.

Respectfully submitted,

SPiDCOM Technologies

Etienne Chevreau  
Chief Technology Officer

C. Scott Willy  
Marketing and Sales

137, avenue du général LECLERC  
F-92340 Bourg la Reine – FRANCE  
Tel : +33 1 41 87 91 90

March 23, 2005